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January, 27 2012

Ms. Jill Sugarman
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, DC 20463

IDENTIFICATION NUMBER: C00431171

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2011-09/30/2011)

This statement is in response to the Commission's letter dated January 4, 2012. The Commission requested additional information on seven items.

First, the Commission requested clarification on contributions that appear to exceed federal limits. The individuals that appear to exceed the contribution limits do not. Any amount over the contribution limit of \$2,500 has been refunded or reattributed within the 60 days. These refunds are either reflected in the October Quarterly or the Year End Report, or will be reflected in the February Monthly.

Second, the Commission requested clarification on donors who had mailing addresses outside the United States. Our Committee has safeguards in place to ensure that all contributions are made by eligible donors only.

Third, with respect to the non-federal committees listed, our Committee has safeguards in place to ensure that these committees used permissible funds for the contributions.

Fourth, regarding the earmarked contributions through a conduit the Committee has taken the steps outlined in the Commission's letter and the changes will be reflected in an Amended Report.

Fifth, the Commission noted missing addresses on Line 23 disbursements. The addresses will be provided in an Amended Report.

Sixth, our disbursement to "Petty Cash" comports with the standards outlined in the Commission's letter.

Seventh, the Committee has reviewed all reimbursements to individuals for travel and subsistence and confirms that no further itemization is required under any Commission regulations for these expenditures.

This should answer the Commission's inquiry.

Sincerely,

Darrell Crate
Treasurer
